

From: [Gary Moore](#)
To: [Rafael Casanova](#)
Subject: Re: Falcon - Approvals for Deliverables
Date: 06/24/2011 04:02 PM

Rafael

For clarification, if a permit is issue by TCEQ, NORCO would be allowed to treat the water and land apply the treated water. I do not believe this is considered land farming.

Gary

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From: Rafael Casanova
Sent: 06/24/2011 02:01 PM CDT
To: Gloria-Small Moran
Cc: Carlos Sanchez; Philip Allen; moore.gary@epa.gov; Anna Milburn; Kenneth Shewmake; Walt Helmick
Subject: Falcon - Approvals for Deliverables

Gloria, attached is the approval letter, dated 05/08/09, that I provided to NORCO before I left for extended leave. This letter indicates approval of the April 1, 2009, Addendum 1 deliverables with modifications for the Phase II RI. This letter includes all comments from the State and Federal trustees and covers the RI/FS WP, FSP, and QAPP.

Also, attached is Phil's e-mail approving the Phase II RI after receiving NORCO's responses to the 05/08/09 approval letter. I am assuming this e-mail includes approval of the WP and QAPP as well. I don't have a record of NORCO's responses.

The most recent 2011 deliverables submitted by NORCO must incorporate these modifications, including the SOPs, etc., specific to TRC Companies. The latest deliverables must still go out to the entire Site Team for review and comment to ensure that they have incorporated all our comments and requirements for the Phase II RI.

Additionally, we need a QMP and QAPP which Walt Helmich must approve. It is my understanding that the QAPP has to be reviewed and approved every year or every two years. I have copied Walt on this e-mail for clarification.

Also, these comments were issued prior to the most recent oil spill by Superior and NORCO's recent proposal to "landfarm" the tank wastes from the Removal Action. We will have to consider these issues as well before going forward with the Phase II RI.

Rafael Casanova, P.G. (Remedial Project Manager, Environmental Scientist)
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Assigned Sites for Investigation and Remediation: (<http://www.epa.gov/earth1r6/6sf/6sf-tx.htm>):

Brine Service Company Superfund Site (Corpus Christi, Texas)
Falcon Refinery Superfund Site (Ingleside, Texas)
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)
Palmer Barge Line Superfund Site (Port Arthur, Texas)
State Marine of Port Arthur Superfund Site (Port Arthur, Texas)